

EXHIBIT P

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Richard Kadrey, et al. v. Meta Platforms, Inc.
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, ET AL.,)
INDIVIDUAL AND REPRESENTATIVE)
PLAINTIFFS,) LEAD CASE NO.
v.) 3:23-cv-03417-VC
META PLATFORMS, INC.,)
DEFENDANT.)
_____)

* * * H I G H L Y C O N F I D E N T I A L * * *
* * * A T T O R N E Y S ' E Y E S O N L Y * * *

VIDEO-RECORDED DEPOSITION OF
ALEXANDER BOESENBERG
MONDAY, NOVEMBER 18, 2024
SAN FRANCISCO, CALIFORNIA
9:04 A.M. PST
REPORTED BY AUDRA E. CRAMER, CSR NO. 9901

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1 BY MR. YOUNG:

2 Q. Okay. Mr. Boesenberg, yes or no:

3 Would your opinion change -- or does -- would
4 the fact that there was a news article today
5 announcing that HarperCollins had entered into a
6 deal with another AI company, would that change
7 your opinion one way or the other whether or not
8 a market existed for books as an AI training
9 market?

10 A. You mean --

11 MR. WEINSTEIN: Object to form.

12 THE WITNESS: You mean the document we
13 reviewed earlier?

14 BY MR. YOUNG:

15 Q. Yes.

16 A. I mean, to be honest, like, that
17 document was very -- I mean, I think very
18 judgmental and biased.

19 I mean, there's a part in there like
20 halfway -- I mean, I'm, like, happy to read it.
21 This part is very biased, No. 1.

22 No. 2, I don't know what the terms of

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1 that agreement are, and so I just have no idea,
2 like, if HarperCollins -- I have no idea if
3 that's -- that potential deal is available to us
4 or not.

5 Q. Okay. So on April 7, 2023, you
6 testified that Mr. Choudhury issued a directive
7 to cease negotiation efforts to license -- cease
8 negotiation efforts with third parties to
9 license the materials for training AI data;
10 right?

11 A. Yes.

12 Q. Okay. Do you recall why that directive
13 was issued?

14 A. Yes.

15 MR. WEINSTEIN: Caution the witness
16 just -- go ahead.

17 BY MR. YOUNG:

18 Q. Okay. Why was that directive issued?

19 MR. WEINSTEIN: Caution the witness not
20 to reveal --

21 THE WITNESS: Subject to --

22 MR. WEINSTEIN: Just a minute.

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1 Caution the witness not to reveal the
2 content of any --

3 THE WITNESS: Yeah, I mean --

4 MR. WEINSTEIN: Let me finish. I know
5 it's late in the day.

6 Caution the witness not to reveal the
7 content of any communication with counsel.

8 Otherwise, you can answer.

9 THE WITNESS: Yeah, I mean, I think
10 that there was a discussion between Sy and legal
11 leadership, and there was a conclusion that it
12 didn't make sense for us to further pursue.

13 MR. YOUNG: I'm going to pass the
14 witness.

15

16 EXAMINATION

17 BY MR. WEINSTEIN:

18 Q. I just had one question for you to
19 clarify the record.

20 Earlier you mentioned an acronym PSA.

21 Do you recall that?

22 A. Yeah. Professional services agreement.

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1 MR. WEINSTEIN: Okay. That's all I
2 had. Thank you very much.

3 THE VIDEOGRAPHER: Okay. That's it?
4 This is the end of Video 1 of 1 and
5 concludes today's proceedings. We are now off
6 the record. The time is 6:08.

7 (Whereupon, at 6:08 P.M. PST
8 the deposition of ALEXANDER
9 BOESENBERG was adjourned.)

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